

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

City of Detroit, Michigan,

No. 13-53846

Debtor.

Hon. Steven W. Rhodes

**STATEMENT OF DETROIT POLICE OFFICERS ASSOCIATION
IN SUPPORT OF THE COURT'S CONSIDERATION OF THE CITY OF DETROIT'S
MOTION TO STRIKE IN PART SYNCORA GUARANTEE INC. AND SYNCORA
CAPITAL ASSURANCE INC.'S SECOND SUPPLEMENTAL OBJECTION TO
THE DEBTOR'S PLAN OF ADJUSTMENT**

The Detroit Police Officers Association (the "DPOA"), through its counsel, Erman, Teicher, Zucker & Freedman, P.C., hereby files this statement (the "Statement") in support of the Court's consideration of The City of Detroit's Motion to Strike in Part Syncora Guarantee Inc. and Syncora Capital Assurance Inc.'s Second Supplemental Objection to the Debtor's Plan of Adjustment [Docket No. 6845] and respectfully represents as follows:

1. Since this Court issued its order for mediation in August of 2013, the DPOA has been an active participant in the mediation process, including in the pension negotiations which led to the Grand Bargain. That process involved difficult and protracted negotiations among multiple constituencies with adverse and competing interests, including the City, the DPOA, other Detroit public safety unions, the State, the Retirement Systems, the Retiree Committee and other active and retiree groups. These very difficult and protracted negotiations were facilitated by the team of mediators appointed by this Court, including the Hon. Gerald Rosen and Eugene Draker.

2. With the further assistance of the mediators, the DPOA has, as of August 20, 2014, tentatively agreed to the terms of a CBA with the City, subject to the ratification of its members. Pursuant to an agreement with the City, the DPOA continues to reserve its rights to re-file its objections to the Plan if the tentative CBA is not ratified. Those objections implicate portions of the Grand Bargain.

3. In spite of its potential objections, the DPOA agrees that the Grand Bargain itself was the result of extremely difficult and protracted arms length negotiations assisted by the mediators, including Chief Judge Rosen and Mr. Driker.

4. While the Hon. Victoria A. Roberts has been primarily responsible for mediating the DPOA's labor negotiations, both Mr. Driker and Judge Rosen have played important and positive roles in the progress of its negotiations with the City.

5. The DPOA supports the City's Motion to Strike to the extent it is based on attacks on the mediators and/or the mediation process.

Respectfully submitted,

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek
Barbara A. Patek (P34666)
Earle I. Erman (P24296)
Counsel for the Detroit Police Officers
Association
400 Galleria Officentre, Suite 444
Southfield, MI 48034
Telephone: (248) 827-4100
Facsimile: (248) 827-4106
E-mail: bpatek@ermanteicher.com

DATED: August 22, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 22, 2014, the foregoing document was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

Barbara A. Patek (P34666)

Earle I. Erman (P24296)

Counsel for the Detroit Police Officers
Association

400 Galleria Officentre, Suite 444

Southfield, MI 48034

Telephone: (248) 827-4100

Facsimile: (248) 827-4106

E-mail: bpatek@ermanteicher.com

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